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May 14, 2020

**BY ECF**

Hon. Jesse M. Furman  
United States Courthouse  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**RE. *Massi v. Salvioni, et al.*, 19cv10097 (JMF)(DCF)**

Dear Judge Furman:

I represent the plaintiff in the above referenced action and submit this request seeking a 30-day extension of the deadline to reopen. Defendants consent to the request.

On March 16, 2020, the court issued an order of dismissal with leave to reopen the action within sixty days if the settlement is not consummated. Since then, parties have negotiated settlement and are nearly completed in finalizing the agreement. In essence, the only thing left is to have our clients review, approve and execute the agreement. The additional 30 days will allow parties enough time to file a Stipulation of Discontinuance.

We thank you very much for your consideration and are available to address any questions the court may have.

Respectfully,

/s/ James E. Bahamonde

James E. Bahamonde, Esq.

**Application GRANTED. The Clerk of Court is directed to terminate ECF No. 21. SO ORDERED.**

cc: (via ECF)  
Kevin M. Ryan, Esq.  
*Attorneys for Jai Muktinath Inc. dba Subway*  
Nicoletti Gonson Spinner Ryan Gulinp Pinter LLP



May 15, 2020